

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re: Philip Brockman Hager) Case No: 25-32367-KLP
Debtor) Chapter 13

OBJECTION TO CONFIRMATION

COMES NOW Paul D. Georgiadis, Counsel for Suzanne E. Wade, Chapter 13 Trustee, and moves this Court to deny confirmation of the Chapter 13 Plan (the Plan”) dated June 25, 2025 and filed June 25, 2025, for the cause as follows:

1. The Debtor filed this Chapter 13 Petition, now pending in the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division, on 06/16/2025, under 11 U.S.C. Chapter 13.
2. The Debtor has proposed a prior Chapter 13 Plan, dated June 25, 2025 which was not confirmed. On June 25, 2025, Debtor filed the instant, amended plan.
3. This Objection is filed pursuant to 11 U.S.C. §1325(a)(4).
4. The proposed Plan fails to provide unsecured creditors a distribution equivalent to that they would receive through the Debtor's Chapter 7 liquidation given the equity available in Debtor's property.
5. The Trustee requests the Debtor provide an independent comparative market analysis of his real property to support the value claimed and file an amended plan increasing the dividend paid to the unsecured creditors.
6. Further, the objection is filed pursuant to 11 U.S.C. §1325(a)(6) for lack of feasibility.
7. The above-filed Chapter 13 case is not eligible for confirmation due to the Debtor's failure to propose a feasible plan. The Plan proposes to pay \$750 for months 1-12, and \$2,550 for the remaining 48 months. However, Debtor has disclosed an MNI of -\$1,804.07 and a DMI of \$8.20. Per Schedules I and J filed on June 25, 2025, Debtor has confirmed that in the year after filing said schedules he expects no increase or decrease in either his income or his expenses.

WHEREFORE, for the reasons stated herein, the Chapter 13 Trustee respectfully moves the Court to deny confirmation of the Debtor's proposed Chapter 13 Plan, and for such further and other relief as the Court deems necessary.

Date: August 12, 2025

/s/Paul D. Georgiadis

Paul D. Georgiadis, Counsel for
Suzanne E. Wade, Chapter 13 Trustee

Paul D. Georgiadis

Counsel for Suzanne E. Wade, Chapter 13 Trustee
Virginia State Bar Number 26340
7202 Glen Forest Dr., Suite 202
Richmond, VA 23226
(804) 775-0979

CERTIFICATE OF SERVICE

I hereby certify a true copy of the foregoing OBJECTION TO CONFIRMATION was served electronically or by first-class mail, postage prepaid, this 12th day of August, 2025, upon the following parties:

Philip Brockman Hager
583 Hazel Place, Unit A
Henrico, VA 23233-7546

JAMES H. WILSON, JR., ESQ.
COUNSEL FOR DEBTOR
4860 COX ROAD, SUITE 200
GLEN ALLEN, VA 23060
jameswilson29@gmail.com

/s/Paul D. Georgiadis
Paul D. Georgiadis, Counsel for
Suzanne E. Wade, Chapter 13 Trustee

Paul D. Georgiadis
Counsel for Suzanne E. Wade, Chapter 13 Trustee
Virginia State Bar Number 26340
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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re: Philip Brockman Hager)	Case No: 25-32367-KLP
583 Hazel Place, Unit A)	Chapter 13
Henrico, VA 23233-7546)	
)	
XXX-XX-2395)	
)	

NOTICE OF OBJECTION TO CONFIRMATION

Paul D. Georgiadis, Counsel for Suzanne E. Wade, Chapter 13 Trustee, has filed papers with the Court objecting to the confirmation of your Chapter 13 Plan dated June 25, 2025 and filed June 25, 2025, for the cause as follows:.

Your rights maybe affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the relief sought in the Objection, or if you want the Court to consider your views on the Objection, then on or before three (3) days before the date of the hearing, you or your attorney must:

X File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, Virginia 23219

You must also mail a copy to:

Suzanne E. Wade, Chapter 13 Trustee
7202 Glen Forest Dr., Suite 202
Richmond, VA 23226

X Attend the hearing on the Motion, scheduled to be held on **August 20, 2025** at **9:10 am** at **United States Bankruptcy Court, Courtroom, 701 E. Broad St., Rm. 5100, Richmond, VA 23219.**

Paul D. Georgiadis
Counsel for Suzanne E. Wade, Chapter 13 Trustee
Virginia State Bar Number 26340
7202 Glen Forest Dr., Suite 202
Richmond, VA 23226
(804) 775-0979

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Objection, and may enter an order granting that relief.

Date: August 12, 2025

/s/Paul D. Georgiadis

Paul D. Georgiadis, Counsel for

Suzanne E. Wade, Chapter 13 Trustee

CERTIFICATE OF SERVICE

I hereby certify a true copy of the foregoing NOTICE OF OBJECTION TO CONFIRMATION was served electronically or by first-class mail, postage prepaid, this 12th day of August, 2025, upon the following parties:

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583 Hazel Place, Unit A
Henrico, VA 23233-7546

JAMES H. WILSON, JR., ESQ.
COUNSEL FOR DEBTOR
4860 COX ROAD, SUITE 200
GLEN ALLEN, VA 23060
jameswilson29@gmail.com

Date: August 12, 2025

/s/Paul D. Georgiadis

Paul D. Georgiadis, Counsel for

Suzanne E. Wade, Chapter 13 Trustee

Paul D. Georgiadis

Counsel for Suzanne E. Wade, Chapter 13 Trustee

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